

February 26, 2021

VIA ECF

Hon. Paul A. Engelmayer, U.S.D.J. Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: United States v. Sean Debnam, 20 Cr. 669 (PAE)

Dear Judge Engelmayer,

On January 22, 2021, I was appointed to represent Sean Debnam as substitute CJA counsel. I write to respectfully request that associate counsel be appointed to assist me in the case. Specifically, I write to request that Fern Mechlowitz, a Senior Associate and full time employee at my firm, be approved to work for more than 10 hours at a rate of \$110 an hour. As set forth in her attached resume, Ms. Mechlowitz is an experienced attorney who graduated from Stanford University and the University of Virginia Law School, worked as an assistant to the Chief of Staff at the White House and as an associate at Arnold & Porter and Sullivan & Cromwell, and clerked for a federal judge, which included work on criminal matters.

Mr. Debnam has been indicated on one count of violating 18 U.S.C. § 1594(c) for sex trafficking conspiracy, and two counts of violating 18 U.S.C. § 1591(a), (b), and (c) for sex trafficking a minor victim. While we are still in the process of obtaining discovery from the Government, we understand that the discovery in this case is voluminous. So far, we have received phone logs, recorded jail calls, records from apps such as CashApp and TextNow, and multiple warrants which must be reviewed individually. We are also expecting a large volume of electronic discovery in the next week or so, and understand that additional discovery must be reviewed at the FBI offices due to the sensitive nature of the materials. I believe that Ms. Mechlowitz's assistance is necessary to efficiently review the discovery, and to represent Mr. Debnam effectively.

Thank you for your consideration.

Sincerely,

/s/ Kristen M. Santillo

Kristen M. Santillo

GRANTED. The Clerk of Court is requested to terminate the motion at Dkt. No. 23.

3/1/2021

SO ORDERED.

PAUL A. ENGELMAYER United States District Judge